

REMARKS

Claims 2-12, 14-17, 19-22, 28-41, 43-45 and 47-49 are pending.

Claims 2-12, 14-17, 19-22, 28-41, 43-45 and 47-49 stand rejected under 35 USC 103(a) as being unpatentable over Vu, U.S. Patent No. 6,369,427, in view of Sun, U.S. Patent No. 6,272,250. This rejection is respectfully traversed.

Claim 19 recites “grouping units of information into clusters based on similarities to create a cluster structure.” Vu fails to teach or suggest this feature.

Vu actually discloses a system for generating navigation trees of documents based on their classifications provided by existing classifiers. The system is considered a classification system as it makes use of class labels provided externally. It does not involve clustering in the construction of the navigation tree, as it does not group documents into clusters automatically based on the similarities. Thus, Vu fails to teach or suggest this feature.

Sun is relied on as teaching the feature of “said classes or clusters have a coarseness which is controlled by a baseline vigilance parameter.” The Examiner asserts that it would have been obvious to have modified Vu in view of Sun to create the claimed invention “to enable a method using a vigilance parameter determines [sic] how may [sic] clusters are derived and how wide a range of colors are included in a cluster” (citing Sun, col. 2, lines 20-25). Applicant respectfully disagrees.

As pointed out above, Vu does not relate to clusters, but rather relates to classes. Thus, one would not have been motivated to look to a reference which relates to clusters to modify its method to use a vigilance parameter to control the coarseness of the clusters.

Further, the Examiner’s stated motivation for modifying Vu in view of Sun makes is difficult for applicant to understand. Applicant fails to see why it would have been desirable for Vu to determine how many clusters are derived or how wide a range of colors are included in the

cluster. Vu does not concern itself with colors. Merely because this may be why Sun uses a baseline vigilance parameter does not mean this would have been desirable to Vu.

In light of the foregoing, applicant submits that the combination of the references fails to teach or suggest the features of the independent claims of this application. Further, applicant submits that one of ordinary skill in the art would not have been motivated to modify Vu in view of Sun even if the combination teaches the features of the claims.

Regarding claims 2 and 28, Vu (col. 8, lines 54-65) discloses how multiple categories provided by external classifier or search engine can be “logically” eliminated into fewer categories in the course of insertion/split and delete/merge operations. It certainly does not teach how said grouping units of information into clusters is carried out automatically to create a machine-generated cluster structure.

Regarding claims 3 and 29, Vu (col. 4, lines 33-37) discloses how preferences can be used to customize construction of the navigation tree. It does not teach “modifying said cluster structure by creating at least one new information cluster defined by the user.”

Claims 4, 8, 30 and 35 relate to labeling information clusters by the user, whereas according to Vu (col. 4, lines 63-65; col. 6, lines 1-14), the tag of a node is a label (consisting of a string of keywords) in a path from the top level root node to the node.

Regarding claims 5, 9, 31 and 36, Vu (col. 7, lines 37-50) discloses an automatic merging operation following a document deletion to keep the tree at a suitable depth and breadth. It does not teach “modifying further comprises merging at least two clusters chosen by the user” explicitly as part of the cluster personalization functions.

Regarding claims 6, 10, 32 and 37, Vu (col. 6, lines 15-30) discloses an automatic splitting following a document insertion to keep the tree at a suitable depth and breadth. It does not teach “modifying further comprises splitting at least one cluster chosen by the user” explicitly as part of the cluster personalization functions.

Regarding claims 7, 11, 33, and 38, Library of Congress classification hierarchical structure is used by Vu (col. 4, lines 55-65) for providing classifications needed for constructing the navigation trees. It certainly cannot serve the purpose of “storing said cluster structure in a knowledge base”.

Regarding claims 15, Vu (901, fig. 9) shows an interface for viewing the document folders. However, the interface does not support “manipulating said cluster structure” using the cluster personalization functions.

Regarding claims 17 and 45, the input vectors P described by Sun (col. 4, lines 12-13) are not the same as the claimed preference vector. The claimed method uses a set of preference vectors in addition to input vectors. The preference vectors representing the user’s preference are used to customize the clustering of the input vectors.

Regarding claims 34 and 39, Vu (col. 5, lines 14-18) discloses retrieval of documents from the navigation tree. This is not the same as “retrieving said personalized cluster structure from said knowledge base.”

Regarding claims 22, Vu (col. 5, lines 19-36) discloses generating navigation trees following usability guidelines. Vu does not teach “retrieving said cluster structure to initialize said user-configurable information clustering system prior to clustering new information.”

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicant petitions for any required relief including extensions of time and authorizes the Commissioner to charge the cost of such petitions and/or other fees due in connection

with the filing of this document to Deposit Account No. 03-1952 referencing docket no. 455392001200.

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Respectfully submitted,

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